

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	17-cr-64-DWF-KMM
	)	
v.	)	<b>DEFENDANT'S MOTION</b>
	)	<b>FOR A BILL OF</b>
EDWARD S. ADAMS,	)	<b>PARTICULARS</b>
	)	
Defendant.	)	

Pursuant to Rule 7(f) of the Federal Rules of Criminal Procedure, Edward S. Adams, through undersigned counsel, moves for an order requiring the government to file a bill of particulars identifying (1) the alleged false or fraudulent pretenses, representations, promises, or concealments, by means of which the charged scheme was allegedly executed; (2) the bases for alleging in paragraphs 46 and 55 that certain nondisclosures were part of a scheme to defraud; (3) the means by which Mr. Adams allegedly “indirectly” made representations about the use of investments as alleged in paragraph 31, and “indirectly” solicited new investors without disclosing certain information to them as alleged in paragraph 55; (4) the “others” through whom Mr. Adams allegedly made the representations alleged in paragraphs 17, 18, 24, 25, 36, and 37; (5) the money or property that was the alleged object of the scheme to defraud; and (6) the other alleged participants in the charged scheme to defraud.

The grounds for this motion are set forth in the accompanying memorandum.

Dated: September 27, 2017

Respectfully submitted,

/s/ James L. Volling

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